

## Chapter 5

# CONSULTATION AND COORDINATION





## PLANNING PROCESS AND HISTORY OF PUBLIC INVOLVEMENT FOR THIS PROJECT

### SUMMARY OF PUBLIC INVOLVEMENT

In the summer of 1999 the public was notified of the Pictured Rocks general management plan effort by means of *Newsletter 1* and announcements in the media. Part of the framework for the plan (and the first task for the planning team) was to reaffirm the purpose, significance, and mission for the national lakeshore. In *Newsletter 1* the public was asked to review the lakeshore's purpose, significance, and mission statements. The first newsletter also asked the public to comment on a list of preliminary topics and issues to be addressed in the plan (also see appendix G).

Nearly 300 written comments were received in response to *Newsletter 1*. Additional comments were provided by people who attended a series of public scoping meetings held in August and September 1999 in Novi, Grand Rapids, Grand Marais, and Marquette, Michigan and in Green Bay, Wisconsin. The rest of the national lakeshore staff (those not on the planning team) were introduced to the planning process, and their comments were solicited as part of the planning process.

*Newsletter 2*, issued in November 1999, provided information on several topics. It summarized public response to the first newsletter and announced that a wilderness study would be prepared as part of the general management plan. It presented draft general management plan "decision points," which are the key questions the plan needs to answer. It also introduced and asked for public input on management prescriptions, which identify a range of ways to manage resources and provide for different experiences in the national lakeshore. More than 250 comments were received in response to *Newsletter 2*.

The results of the public responses to *Newsletter 2* were summarized in May 2000 in *Newsletter 3*. This newsletter also presented revised management prescriptions and five draft alternative concepts. In June 2000 public meetings were held in Lansing, Grand Marais, and Wetmore, Michigan to provide another way for the public to learn about the alternatives, ask questions about them, and share ideas with the planning team. A total of 107 persons attended the meetings, and more than 500 written responses were received. Using input from the public and considering the probable environmental consequences and costs of the alternatives, the planning team developed a preferred alternative. A *Draft Pictured Rocks National Lakeshore General Management Plan and Wilderness Study Environmental Impact Statement* was produced and distributed for public review.

All newsletters and draft documents were also available on-line at  
[www.nps.gov/piro](http://www.nps.gov/piro)

A *Federal Register* notice and media announcements initiated the beginning of a formal public comment period on the *Draft General Management Plan and Wilderness Study / Environmental Impact Statement*. All interested agencies, groups, and individuals were invited to review the document and submit comments.

The date, time, and locations of the five public meetings were announced in the local media and in the transmittal letter that accompanied the draft document that was sent to the 3,200 people on the mailing list. The availability of the *Final General Management Plan and Wilderness Study / Environmental Impact Statement* as also announced in the *Federal Register*.

## **SUMMARY OF THE PUBLIC MEETINGS ON THE DRAFT GENERAL MANAGEMENT PLAN AND WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT**

Five public open houses were held throughout Michigan during the comment period; two of these meetings also included formal hearings on wilderness. The open houses were held in Marquette (August 25, 2003), Munising (August 26), Grand Marais (August 27), Lansing (August 28), and Novi (August 28). A total of 129 people attended the open houses. Most of the people came because they were interested in learning more about the general management plan and wilderness study. An official transcript was prepared of the two wilderness hearings.

In accordance with Wilderness Act requirements, formal public hearings were held at the Munising Community Credit Union on August 26, and at the Burt Township Public School in Grand Marais on August 27. Each participant was allocated four minutes, and their comments were recorded and transcribed by a professional court reporter. In all, 21 people spoke at the Munising hearing and four people spoke at the Grand Marais hearing. Of those who spoke in Munising, seven people supported wilderness (either expressing support for wilderness or for an alternative that proposed wilderness) and 14 people opposed wilderness. Of the people who spoke in Grand Marais, three people supported wilderness (either expressing support for wilderness or for an alternative that proposed wilderness), while one person did not appear to favor or oppose wilderness. Copies of the hearing transcripts can be seen at the Pictured Rocks National Lakeshore headquarters in Munising.

## **CONSULTATION**

In accordance with Section IV of the 1995 programmatic agreement among the National Park Service, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers, certain undertaking require only internal NPS review for Section 106 purposes. Other undertakings require standard Section 106 review in accordance with 36 CFR 800, and in those instances the National Park Service consults as necessary with the state historic preservation officer, the Advisory Council on Historic Preservation, tribal officials, and other interested parties.

NPS staff met with Mr. Eugene Big Boy, Tribal Chairman of the Bad River Band (Wisconsin) of the Lake Superior Ojibwa Tribe. There are about 1,500 members of the tribe on the reservation and some 7,000 nationwide. Mr. Big Boy did not have any immediate concerns and expressed interest in keeping informed of planning for the general management plan and other activities within the Pictured Rocks National Lakeshore.

Other affiliated tribes were contacted via letter and phone calls but did not elect to meet with national lakeshore staff. No comments were received.

A letter requesting comments was sent to tribal chairpersons on July 23, 2003. The *Draft General Management Plan* was either included with the letter or sent under separate cover. The following tribes were sent letters and the draft plan:

Bay de Noc Indian Cultural Association  
Bay Mills Indian Community of the Sault  
Ste. Marie Band of Chippewa Indians  
Bad River Band of the Lake Superior Tribe  
of Chippewa Indians  
Forest County Potawatomi Community of  
Wisconsin Potawatomi Indians  
Grand Traverse Band of Ottawa and  
Chippewa Indians of Michigan

Hannahville Indian Community of  
Wisconsin Potawatomi Indians of  
Michigan  
Ho-Chunk Nation  
Keweenaw Bay Indian Community  
Lac Courte Oreilles Band of Lake Superior  
Chippewa Indians  
Lac du Flambeau Band of Lake Superior  
Chippewa Indians  
Lac Vieux Desert Band of Lake Superior  
Chippewa  
Little Traverse Bay Bands of Odawa  
Indians  
Menominee Indian Tribe of Wisconsin  
Red Cliff Band of Lake Superior  
Chippewa Indians  
Saginaw Chippewa Indian Tribe of  
Michigan  
Sault Ste Marie Tribe of Chippewa Indians  
Stockbridge Munsee Community of  
Mohican Indians  
St. Croix Chippewa Indians of Wisconsin  
Sokoagon Chippewa Community Mole  
Lake Band

No responses were received from the tribes. Thus, another letter and copy of the draft management plan was mailed on February 9, 2004.

One response, from the Lac du Flambeau Band of Lake Superior Chippewa Indians, was received on March 10, 2004. The tribe indicated that it had no comments related to the plan.

Phone calls were placed to the Bay Mills Indian Community of the Sault Ste. Marie Band of Chippewa Indians on February 18, March 5, and March 9, 2004. Messages were left for the tribal biologist.

Phone calls were placed to the Great Lakes Fish and Wildlife Indian Commission (GLIFWC) on March 9 and March 19, 2004. On March 23, GLIFWC biological services director Neil Kmiecsek contacted the national lakeshore. He indicated that tribes represented by commission had no comments on

the draft management plan. The commission represents the following tribes within the 1842, 1837, and 1854 treaty areas:

Bad River Band of the Lake Superior Tribe  
of Chippewa Indians  
Red Cliff Band of Lake Superior  
Chippewa Indians  
St. Croix Chippewa Indians of Wisconsin  
Sokoagon Chippewa Community Mole  
Lake Band  
Keweenaw Bay Indian Community  
Lac Courte Oreilles Band of Lake Superior  
Chippewa Indians  
Lac du Flambeau Band of Lake Superior  
Chippewa Indians  
Lac Vieux Desert Band of Lake Superior  
Chippewa

A phone message was left for the Chippewa/Ottawa Resource Authority on March 30, 2004. A phone call was placed to Tom Gorenflo of the Chippewa/Ottawa Resource Authority on April 6, 2004. Mr. Gorenflo indicated tribes located in the lower peninsula of Michigan have no comment on the draft management plan.

In accordance with Section 7 of the Endangered Species Act, the National Park Service consulted with the U.S. Fish and Wildlife Service and Michigan Department of Natural Resources regarding species known or potentially occurring in the national lakeshore. Section 7 consultation was initiated in September 1999. The Fish and Wildlife Service responded with a species list in October 1999. The National Park Service again consulted the Fish and Wildlife Service in May 2001, requesting an update of the list, including proposed or candidate species and designated critical habitat or essential habitat that might occur at or near the lakeshore. The Fish and Wildlife Service responded to that request in June 2001.

In response to the draft *General Management Plan / Environmental Impact Statement*, the Fish and Wildlife Service submitted comments

on October 31, 2003, stating that additional Section 7 consultation was needed before the Fish and Wildlife Service could concur with the determination in the draft document (see the later “Comments and Responses” section). The National Park Service subsequently prepared a biological assessment for the preferred alternative in the *General Management Plan*, which is included in appendix D. The biological assessment was submitted to the Fish and Wildlife Service on March 16, 2004. The Fish and Wildlife Service has issued a letter of concurrence with the findings in the biological assessment. This letter of concurrence is included in appendix D.

#### **LIST OF AGENCIES AND ORGANIZATIONS RECEIVING A COPY OF THE FINAL PLAN**

Note: an \* denotes those agencies or organizations that responded to the draft.

##### **Federal Agencies**

Advisory Council on Historic Preservation  
 Army Corps of Engineers  
 Bureau of Indian Affairs  
 Bureau of Land Management  
 Environmental Protection Agency, Region 5  
 Federal Highway Administration  
 International Joint Commission  
 National Park Service  
     Washington Office  
     Midwest Regional Office  
     Ice Age and North Country National Scenic Trails  
     Isle Royale National Park  
     Sleeping Bear Dunes National Lakeshore  
     Keweenaw National Historical Park  
 Ontario Ministry of Natural Resources  
     Pukaskwa National Park  
 US Fish & Wildlife Service  
     Seney National Wildlife Refuge  
     East Lansing Field Office  
 US Forest Service  
     Hiawatha National Forest  
     Grand Island National Recreation Area  
 US Geological Survey

USDA- Natural Resources Conservation Service  
 USGS- Biological Resources Division

##### **Tribes**

Bay de Noc Indian Cultural Association  
 Bay Mills Indian Community  
 Bay Mills Tribe  
 Bad River Tribal Council  
 Forest County Potawatomi Tribal Office  
 Grand Traverse Band of Ottawa & Chippewa  
 Hannahville Indian Community  
 Keweenaw Bay Band  
 Keweenaw Bay Indian Community  
 Lac Courte Oreilles Governing Board  
 Lac du Flambeau Tribal Council  
 Lac Vieux Desert Band of Lake Superior Chippewa  
 Menominee Indian Tribe  
 Red Cliff Tribal Council  
 Saginaw Chippewa Indian Tribe  
 Sault Tribe of Chippewa Indians  
 Sokaogon Chippewa Community  
 Sokaogon Chippewa Tribal Office  
 St Croix Tribal Council  
 Stockbridge Munsee Tribal Council  
 Wisconsin Winnebago Tribal Office

##### **US House of Representatives/Senate**

The Honorable Bart Stupak, U.S. House of Representatives\*  
 The Honorable Carl Levin, U.S. Senate  
 The Honorable Debbie Stabenow, U.S. Senate

##### **Michigan House of Representatives/Senate**

The Honorable Michael Prusi, Michigan Senate, district #38\*  
 The Honorable Stephen F. Adamini, Michigan House, district 109

##### **State Agencies**

The Honorable Jennifer Granholm, Michigan Governor  
 Michigan Department of Environmental Quality  
 Michigan Department of Natural Resources  
 Michigan Department of State  
 Michigan Department of Transportation  
 Michigan Air National Guard

Michigan Environmental Council  
Michigan Resources Commission\*  
Michigan Welcome Center  
Minnesota Department of Natural Resources  
State Historic Preservation Office  
State of Michigan

**City/Township/County Agencies**

Alger Chamber of Commerce  
Alger Conservation District  
Alger County Board of Commissioners\*  
Alger County Clerk  
Alger County Planning Commission  
Alger County Sheriff's Dept  
Alger Parks & Recreation Dept  
Altran  
AuTrain Township  
Burt Township Planning & Zoning  
Commission  
Burt Township Public School  
Burt Township Board\*  
Central U.P. Planning & Development  
Commission  
Eastern U.P. Community Assistance Tech  
Council  
Grand Island Township  
Limestone Township  
Marquette Co Soil Conservation District  
Mathias Township  
Munising City\*  
Munising Township\*  
Munising Township Board  
Onota Township  
Rock River Township  
Upper Great Lakes Regional Commission

**Organizations**

Alger County Historical Society  
Alger County Kiwanis  
Alger County Promotional Committee  
Alger County Sportsman Club  
Alger Snowmobile Association  
Alger Underwater Preserve  
American Legion Post 131  
Audubon Council Minnesota  
Audubon Society - Laughing Whitefish  
Chapter  
Audubon Society - Northeast Wisconsin  
Bear Hunters Association

Capitol Area Audubon Society  
Central Lake Superior Watershed Partnership  
Central U.P. Sportfishing Association  
Central U.P. Sportsmen Association  
Champion International Corporation  
Circle Michigan  
Coalition for Canyon Preservation  
Degraff Nature Center  
Delta County Chamber of Commerce  
Dickinson County Chamber of Commerce  
Discovering Michigan  
Ducks Unlimited  
Grand Island Lodge 422, Masonic Lodge  
Grand Marais Chamber of Commerce  
Greater Ishpeming Chamber of Commerce  
Great Lakes Cruising Club  
Great Lakes Indian Fish & Wildlife  
Commission  
Great Lakes Lighthouse Keepers Association  
Great Lakes Natural Resources Center  
Great Lakes Sea Kayak Club  
Great Lakes Sea Kayakers  
Great Lakes Shipwreck Museum  
Great Lakes Sport Fishing Council  
Great Lakes Sports Fishermen Inc  
Headwaters Environmental Station  
Izaak Walton League  
Kalamazoo Nature Center  
Little Traverse Conservancy  
Loyal Order of the Moose  
Marines of Munising  
Marquette Area Chamber of Commerce  
Marquette County League of Women Voters  
Menominee Chamber of Commerce  
Michigan Association of Conservation  
Districts  
Michigan Association of Timbermen\*  
Michigan Audubon Society  
Michigan Bearhunter's Association  
Michigan Bow Hunters Association  
Michigan Chamber of Commerce  
Michigan Loon Preservation Society  
Michigan Natural Areas Council  
Michigan Natural Features Inventory  
Michigan Nature Association  
Michigan Sharp-tailed Grouse Association  
Michigan Snowmobile Association  
Michigan Trailfinders Club  
Michigan Trappers Association

Michigan United Conservation Clubs  
Michigan Waterfowl Association  
Michigan Wildlife Habitat Foundation  
Moosewood Nature Group  
Munising Council – Knights of Columbus  
2804  
Munising Lioness Club  
Munising Lions Club  
Munising Memorial Hospital Auxiliary  
Munising Rotary Club  
Munising Senior Citizens Club, Inc  
Munising Visitors Bureau\*  
National Federation of Federal Employees  
National Parks & Conservation Association  
Natural Areas Association  
Newberry Area Chamber of Commerce  
North Country National Scenic Trail  
Association  
North Country National Scenic Trail Hikers  
Northeast Michigan Consortium  
Oakland Audubon Society  
Oneida Business Committee  
Paradise Area Chamber of Commerce  
Rails to Trails Conservancy  
Ruffed Grouse Society  
Sault Ste. Marie Chamber of Commerce  
Schoolcraft Co Chamber of Commerce  
Sierra Club  
Sigurd Olson Environmental Institute  
Skylane Pictured Rocks  
Snell Environmental Group  
Society of American Foresters  
St. Ignace Area Chamber of Commerce  
Superior Scenic Drive Committee  
Superiorland Fish & Game Club  
The Nature Conservancy  
Timber Products Michigan  
Travel Michigan, MEDC  
Trout Unlimited - Michigan State Council  
Trout Unlimited  
Trust for Public Lands  
U.P. Bear Houndsmen  
U.P. Catholic  
U.P. Whitetails Association Inc  
Upper Peninsula Environmental Coalition  
Upper Peninsula Highway Coalition  
Upper Peninsula Travel & Recreation Assn.  
Vietnam Veterans Association Chapter 237  
West Shore Snowmobile Council

Wetmore Community Club  
White Water Associates Inc  
Whitefish Point Bird Observatory  
Wilderness Society  
Wildlife Unlimited of Delta County

#### **Local Businesses**

BayWatch Resort  
Camel Riders Resort  
Curly's Hilltop Grocery  
Das Gift Haus  
Forest Glen Resort  
ForestLand Group, Limited Liability  
Corporation  
Hiawatha Log Homes  
Mead Corporation  
Melstrand General Store  
Munising Pro Sports  
Pictured Rocks Cruises  
Robinsons Grocery  
Shelter Bay Forests  
Shingleton Oil Co  
Shipwreck Tours  
Trenary Home Bakery  
Wandering Wheels Campground  
White Fawn Lodge

#### **Media**

Action Shopper News  
Associated Press  
Boat U.S. Reports  
Booth Newspapers  
Capitol Times  
Chicago Tribune  
Daily Globe  
Daily Mining Gazette  
Delta Reporter  
Detroit Free Press  
Detroit News  
Escanaba Daily Press  
Evening News  
Grand Marais Gazette  
Grand Marais Pilot  
Grand Rapids Press  
Green Bay Press Gazette  
Iron Mountain News  
Iron River Reporter  
Lake Superior Magazine  
Lansing State Journal



Manistique Pioneer  
Marinette Eagle- Star  
Marquette Monthly  
Michigan Boat & Travel  
Michigan Snowmobiler  
Milwaukee Journal  
Milwaukee Sentinel  
Mining Journal  
Munising News  
Newberry News  
North Woods Call  
Porcupine Press  
WBAY- TV  
WDBC- WYKX  
WFRV- TV  
WGLQ  
WHCH- WQXO  
Wheels Cycle & Sport  
WHWL  
WJPD- WDMJ- WIAN  
WLUC- TV  
WLUK- TV  
WMQT  
WNBY  
WRUP- WFXD  
WSOO News  
WTIQ

#### **Education**

AuTrain Onoto Public School  
Bay de Noc Community College  
Central Elementary School  
Delta Schoolcraft ISD  
Lake Superior State University  
Marquette- Alger ISD  
Mather Middle School  
Michigan State University  
Michigan Tech University  
MSU Extension

Munising Baptist School  
Munising High School  
Munising Public Schools  
Northern Michigan University  
Ohio University, Athens, Ohio  
Okemos Montessori/Radmoor School  
Seventh Day Adventist School  
Superior Central Public Schools  
University of Michigan  
University of Minnesota  
University of Pittsburgh  
University of Rochester  
University of Wisconsin  
University of Wisconsin - CPSU  
Utah State University

#### **Libraries**

Blue Water Library  
Brown County Public Library  
Detroit Public Library  
Gogebic Community College Library  
Grand Marais Public Library  
Grand Rapids Public Library  
Kent County Library  
Lansing Public Library  
Lenawae County Public Library  
Library of Michigan  
Macomb Library  
Mideastern Michigan Library  
Munising Public Library  
Muskegon County Library  
Novi Public Library  
Oakland County Library  
Peter White Public Library  
Superiorland Library Cooperative  
Traverse Area District Library  
Washtenaw Public Library  
Wayne Public Library

## SUMMARY OF PUBLIC COMMENTS ON THE DRAFT GENERAL MANAGEMENT PLAN AND WILDERNESS STUDY / ENVIRONMENTAL IMPACT STATEMENT

This section presents elected officials, government agency, organization, and public comments received on the *Draft General Management Plan and Wilderness Study / Environmental Impact Statement* for Pictured Rocks National Lakeshore. The comments and agency responses allow interested parties (including the National Park Service) to review and assess how other agencies, organizations, and individuals have responded to the preferred alternative, the other alternatives, and their potential impacts.

The planning team received almost 800 separate written responses during the comment period, including letters, faxes, postcards, and e-mail comments. Of those responses, 28 were from agencies and organizations, including three federal agencies, two state agencies, four local governments, 14 environmental groups, and five other special interest groups. One state senator and one congressman provided comments. All of the other responses were from individuals and businesses. Comments were received from across the country, although most were from the Midwest, and specifically the Upper and Lower Peninsula of Michigan.

The largest group of respondents did not express a preference for any of the alternatives. Instead, 58% of the written comments focused only on wilderness. The overwhelming majority of this group (about 99%) supported wilderness designation in the national lakeshore, although they did not specify locations or size of the wilderness area. (All of the environmental groups supported wilderness designation in varying degrees.) These e-mail comments were largely identical form responses. Most of the responses were from nonlocal citizens. (Local is defined as residents of Alger County and the Upper

Peninsula of Michigan.) People who supported wilderness (including those supporting alternative E and the preferred alternative) gave a variety of reasons, including: there is not much wilderness left and/or is vanishing on the Upper Peninsula, Michigan, Midwest, or the U.S.; wilderness will enable future generations to enjoy this area; wilderness will ensure that the national lakeshore's resources are protected from development and human impacts; wilderness will ensure that visitors have an opportunity to enjoy a quiet, natural setting; wilderness will keep access as it is; and there are plenty of places people can take motor vehicles while there are very few places for hikers and kayakers who don't want to hear the noise of motor vehicles. A number of these people also noted they would like wilderness in order to eliminate motorized vehicles like personal watercraft, and/or were opposed to paving H-58.

A much smaller group did not express a preference for an alternative but wrote in opposition to wilderness. These respondents (about 1% of the commenters who did not express a preference for an alternative but expressed a preference on wilderness) were primarily local residents and local or state organizations including the Michigan Association of Timbermen, Michigan Natural Resources Commission, and Congressman Bart Stupak. (With the exception of the environmental groups, virtually all local organizations opposed wilderness.) This group (as well as many who favored alternatives A, C and the no-action alternative) opposed wilderness for several reasons: they felt it would restrict access into the national lakeshore; prevent the elderly and disabled from enjoying areas; alienate visitors; hurt business (or at least not further economic growth); there were enough areas already

designated as wilderness; the area is already managed as wilderness so there is no need to designate it; and there is no need for a change in management.

Of those who expressed a preference for the alternatives, the largest group (38%) supported alternative E or variations of alternative E. Out of that group 36% were local (Alger County and the Upper Peninsula of Michigan) and 64% were nonlocal. Organizations that supported this alternative included most (10) of the conservation groups, including the Lake Superior Alliance, Sierra Club, Bluewater Network, PEER, and the Wilderness Society. The primary reasons commenters gave for supporting alternative E is that it proposed the largest area for wilderness, saving the center of the national lakeshore for a wilderness experience; it best protected resources; and it struck a balance between development and preservation. Some also noted it was the least costly alternative. A relatively large number of the respondents who supported alternative E proposed variations in the alternative. The most common variations were not paving H- 58, allowing electric motors on the lakes in the wilderness area, and banning personal watercraft from the park. The Bluewater Network opposed the use of personal watercraft, ATVs, snowmobiles, and outboard motors in the national lakeshore, and urged that strong guidelines and policies be established before partnership agreements are created. PEER and the Wilderness Society supported adding the Grand Sable Dunes as a second wilderness unit.

The preferred alternative was also supported by a large number of commenters (24% of those who expressed a preference for an alternative). Organizations that favored this alternative or variations included the Izaak Walton League (Michigan Division), Sierra Club<sup>1</sup>, The Nature Conservancy, Upper Peninsula Environmental Coalition, and two

businesses. Commenters that supported the preferred alternative generally saw the alternative as a compromise, designating some wilderness without restricting access to much of the national lakeshore — the alternative was seen as protecting the area while providing for a variety of uses into the future. The preferred alternative also had suggestions for a large number of variations, including not paving H- 58, permitting electric motors on boats in the wilderness, restricting personal watercraft use, and providing an education center for school groups. The Izaak Walton League favored limiting all motorized vehicle access to major points of interest or as access to national lakeshore facilities and expanding the protection of Lake Superior shoreline and internal wilderness. The Upper Peninsula Environmental Coalition recommended several changes in the alternative, including providing additional protection to the Chapel Lake area (not the casual recreation management prescription), prohibiting the beaching and anchoring of motorboats at Chapel Beach, extending the nonmotorized zone from the wilderness area west to Grand Portal Point, and not constructing a new campground north of the Miners Falls road.

Alternative C was preferred by 22% of those expressing a preference, primarily local residents and organizations including the Township and city of Munising, Alger County, State Senator Prusi<sup>2</sup>, and the Upper Peninsula Trapper's Association. This group primarily supported alternative C because they wanted additional access and more development and services in the national lakeshore.

Much smaller numbers of people and organizations supported the no- action alternative (6% of those expressing a preference) and alternative A (9%). These alternatives were primarily supported by local residents. The no- action alternative was supported because this group did not see a need for any change in management. Most did

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<sup>1</sup> The Sierra Club supported both the preferred alternative and alternative E.

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<sup>2</sup> Senator Prusi expressed support for either alternative C or alternative A.

not want changes in services or developments (although a few still wanted road improvements). Of those who gave reasons for supporting alternative A, the most common reason was that they were opposed to wilderness, believing it would take away or restrict access into much of the national lakeshore (although they apparently supported preserving the central portion of the lakeshore in a primitive condition). Several of the people favoring alternative A wanted H- 58 paved, and a few mentioned they didn't want to see a campground established in the Miners area.

One business, Peoples State Bank, supported a new alternative that incorporated a combination of actions in alternative C and the preferred alternative. One individual also proposed a new alternative that included such actions as keeping Beaver Basin relatively undeveloped without a wilderness designation, putting in bicycle trails, widening the trails, allowing random camping, disallowing hunting and trapping in the national lakeshore, and expanding use for mountain bike riders, horseback riders, and skiers.

Four agencies did not provide opinions on the alternatives, including the Burt Township Board and the Michigan Department of Natural Resources, but instead addressed specific concerns. Among its suggestions, the Burt Township Board believed that handicap access should be a priority at several locations; they also favored allowing electric motors and small gas motors on the Beaver Lakes and wanted to see more access for local residents, including improvements at Grand Sable Lake. The Michigan Department of Natural Resources was also opposed to banning motors on the lakes and was concerned about the impact of wilderness on its ability to monitor fish populations. It also was concerned about the impacts of improvements to H- 58. The U.S. Fish and Wildlife Service expressed concerns about the lack of discussion and inaccuracies in the document regarding federally threatened and

endangered species, and noted that section 7 consultations needed to be completed.

A few individual commenters didn't express a preference for alternatives or for wilderness. Instead, they focused on specific concerns or issues. Generally, there was no common thread in these comments. A couple people, however, wrote urging that more camping facilities be provided, especially at Beaver Lake.

When one looks at the overall written comments, those supporting at least some wilderness (91% of the commenters, including those individuals and organizations supporting the preferred alternative, alternative E, or variations, or just writing in support of wilderness) far outweighed those individuals and organizations opposing wilderness (9% of the commenters, including those supporting the no- action alternative, alternative A, alternative C, or variations, or just writing in opposition to wilderness).

## SUMMARY OF WRITTEN COMMENTS

There were 799 written comments received on the draft document. There were 765 written comments from individuals. Written comments were also received from two local, state, and federal representatives, three federal agencies, two state agencies, four local and regional governments, four businesses, and 19 organizations and special interest groups. Three hundred and ten total written comments were received expressing support for an alternative (282 individuals and 28 agencies/organizations/businesses/ officials).

Of the commenters not favoring an alternative, 462 supported wilderness and six opposed wilderness. Five hundred and seventy six commenters supported wilderness irrespective of alternative while 46 opposed wilderness irrespective of alternative. One commenter suggested a new alternative. One

handwritten comment letter was indecipherable.

For the commenters supporting an alternative, the results are as follows:

Alternative	Number
Preferred	47
Preferred with variations	19
No Action	17
No Action with variations	3
A	25
A with variations	2
C	56
C with variations	4
E	88
E with variations	21

## RESPONSES TO COMMENTS / SUBSTANTIVE COMMENTS

The Council on Environmental Quality (1978) guidelines for implementing the National Environmental Policy Act requires the National Park Service to respond to substantive comments. A comment is substantive if it meets any of the follow criteria (from *Directors Order 12: Conservation Planning and Environmental Impact Analysis*, NPS 2001):

It questioned, with reasonable basis, the accuracy of the information.

It questioned, with reasonable basis, the adequacy of environmental analysis.

It presented reasonable alternatives other than those proposed in the plan.

It would cause changes or revisions in the preferred alternative.

Many of the comments expressed an opinion but did not meet the above criteria. Others were outside the scope of the *Pictured Rocks General Management Plan and Wilderness Study / Environmental Impact Statement*.

Although the National Park Service values this input, no response is provided to such comments. Comments that identified errors such as misspelled words and typos were not included as substantive, but the National Park Service appreciates the information and has corrected the errors.

As required, all agency letters are reprinted. Photocopies of letters from elected officials, organizations, and individuals with substantive comments are reprinted. The National Park Service's responses to the substantive comments are adjacent to the comment.

Written transcripts from the two wilderness hearings and copies of all the written comments are available for public review at Pictured Rocks National Lakeshore headquarters.

## CHANGES TO THE PREFERRED ALTERNATIVE IN RESPONSE TO PUBLIC COMMENTS

In response to public comment, the National Park Service changed the management prescription for the 0.25 mile portion of the national lakeshore in Lake Superior from primitive to casual recreation. This allows for motorboat use along the entire 42- mile shoreline. Instead of prohibiting all motorized boating, electric motors would be allowed on Little Beaver and Beaver Lakes; however, gasoline- powered motorboats would still be prohibited.

A concerned member of the public noted that there was a difference between the wilderness acreage figures and percentages in the draft plan and the same figures that were presented in post- draft letters/news releases. Before the draft was printed, it was noted that the eastern wilderness boundary as shown on the Wilderness Study map was difficult to identify from the ground. The eastern wilderness boundary was moved west slightly to the

mouth of Sevenmile Creek to make it more easily identifiable. This should have resulted in a change of wilderness acreages and percentages in the draft in those alternatives —

- in the preferred from 12, 843 acres and about 18% of the national lakeshore proposed for wilderness designation to 11,739 acres and about 16%, and
- in alternative E from 18,063 acres and 25% of the national lakeshore proposed for wilderness designation to 16,959 acres and 23% .

Those changes have been made in this final plan.

## **SUBSTANTIVE COMMENT LETTERS AND NPS RESPONSES**

Following are reprinted letters and responses to substantive comments.

It should be noted that when referring to motorized boating use and access, personal watercraft (PWC) use is a separate issue. Regulations for PWC use are currently in the Federal rulemaking process. Under the proposed regulations, PWC use would be restricted to designated launch sites (currently Sand Point) and on Lake Superior within the national lakeshore boundary from the western boundary up to the east end of Miners Beach. Personal watercraft users would be allowed to beach their craft on Miners Beach. Personal watercraft would not be allowed to launch or operate elsewhere in the national lakeshore.

## COMMENTS

**BART STUPAK**  
1ST DISTRICT, MICHIGAN



JAYBURN HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515-2201  
PHONE: (202) 225-4735  
FAX: (202) 225-4744  
<http://www.house.gov/stupak>  
(Email through Website)

*Congress of the United States*  
*House of Representatives*  
Washington, DC 20515-2201

ET SCHLOSSER—CHIEF OF STAFF  
A BALDINI—DISTRICT DIRECTOR

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November 4, 2003

Karen Gustin  
Superintendent  
Pictured Rocks National Lakeshore  
P.O. Box 40  
Munising, MI 49862-0040

Dear Superintendent Gustin:

I am submitting my comments regarding the revised General Management Plan (GMP) for Pictured Rocks National Lakeshore (PRNL).

The new GMP will guide the lakeshore's management policies and decisions for the next 20 years. As part of this process, a range of four alternatives, and a "No Action Alternative" were developed to address wilderness as well as other visitor use and resource issues.

While I am not taking a position on a specific alternative to support, there are some issues that I believe warrant particular attention.

1. First, some of the alternatives create a wilderness designation. I am concerned about the designation of any additional wilderness because it would restrict access to public lands and would adversely impact the local economy. Whether it be the National Forests or the National Parks, people in Northern Michigan have repeatedly seen their recreational opportunities on federal lands threatened or eliminated. In order for Alger County, the City of Munising and the adjacent areas to grow, we need to maintain the current method and level of visitor access to the park. Many tourists visit the park annually for recreation purposes and as a result spend money locally on everything from gas to food to lodging to entertainment.
2. Moreover, one of the proposed wilderness designation areas, the Chapel Basin, is also one of the busiest, most visited areas in PRNL, and therefore should not be considered for additional wilderness designation. Designation would add new restrictions on motor boat use, and affect access to fishing areas.
3. That is why I support a broader more inclusive recreation policy. National Park Service (NPS) should be advocating a multi-use policy in PRNL where no recreational interests are treated unfairly.

### REPLY TO:

1 EAST CONSUMMATION PKWA, MI 49707 (91) 356-0090  
2 SOUTH 6TH STREET SUITE 3 CRYSTAL FALLS, MI 49820  
902 LUDINGTON STREET ESCANABA, MI 49829 (906) 786-4504  
616 SHERIDAN BOUGHTON, MI 49931 (906) 482-1371  
1229 WEST WASHINGTON MARQUETTE, MI 49855 (906) 226-3700  
200 DIVISION STREET POTOSKEY, MI 49770 (231) 348-0657  
512 EAST BOUGHTON AVENUE WEST BRANCH, MI 48661 (989) 345-2258

## RESPONSES

### Elected Officials

Bart Stupak

1. The preferred alternative was created in response to public comments on the draft alternatives. The wilderness boundary was drawn around the access road to Beaver Lakes and Little Beaver campground to continue to provide vehicular access to this popular area. In response to public comment on the draft plan, the National Park Service will allow electric motors on Little Beaver and Beaver Lakes and will change the management prescription on the 0.25 mile wide portion of Lake Superior adjacent to proposed wilderness, from primitive to casual recreation, which will allow motorized use from Spray Falls to Sevenmile Creek. The intent of the preferred alternative was to provide additional recreational and access opportunities on the east and west ends of the national lakeshore. Specifically, construction of a new drive-in campground in the Miners area, upgrades to the trails in the Chapel area, improved access to east-end attractions, addition of a boat-in campsite on Grand Sable Lake, new day use area at Coast Guard Point (pending land acquisition), and conversion to public use the Sand Point Coast Guard Station and Munising Range Light Station once a new administration facility is built.
2. Chapel Basin was not included in the proposed wilderness in the preferred alternative.
3. As mentioned above, the change in management prescriptions from primitive to casual on Lake Superior allows for motorboat use and fishing access.

*Elected Officials*

## COMMENTS

## RESPONSES

The GMP must include the perspective of all park users -- picnickers, hikers, boaters, campers, canoeists, anglers, hunters, cross-country skiers, and snow mobilers.

Additionally, I urge the lakeshore management to work with the county in partnership with the Michigan Department of Transportation (MDOT) to quickly move the Alger County Highway 58 project to completion. The federal government has done its part in contributing \$5 million to this project and it is now time for the state to finally see this to fruition. Until its completion, the cost to rebuild H-58 will continue to increase as funding continues to be drawn out.

Ultimately, it is the local governmental units that are most directly impacted by the day to day operation of the park and whose comments, I hope the NPS would closely review as to the direction and future of PRNL. Working together, the revised GMP can benefit the park, its visitors and the local communities.

Sincerely,



BART STUPAK  
Member of Congress

BTS/af



## COMMENTS

## RESPONSES



**MICHAEL PRUSI**  
38TH DISTRICT  
P.O. BOX 30036  
LANSING, MICHIGAN 48909-7536  
PHONE: (517) 373-7840  
FAX: (517) 373-9532  
senmprusi@senate.michigan.gov

### THE SENATE STATE OF MICHIGAN

October 23, 2003

APPROPRIATIONS - MINORITY V.C.  
CAPITAL OUTLAY (MVC)  
COMMERCE, LABOR AND  
ECONOMIC DEVELOPMENT (MVC)  
HIGHER EDUCATION  
JUDICIARY AND CORRECTIONS

Superintendent Karen Gustin  
Pictured Rocks National Lakeshore  
P.O. Box 40  
Munising, MI 49862

Dear Superintendent Gustin:

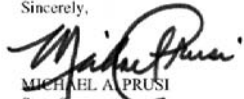
I write today in support of resolutions recently passed by the Munising City Commission, the Alger County Board of Commissioners, and the Michigan Natural Resources Commission in opposition to pending National Park Service proposals to designate Beaver and Little Beaver Lakes as wilderness areas.

1. As you know, residents of Alger County and the Upper Peninsula have long enjoyed the recreational and cultural opportunities presented within Pictured Rocks National Lakeshore. The proposed designation of 11,739 acres as a wilderness area in the Beaver Basin will further restrict vehicle access to and recreational opportunities in this heavily traveled and popular destination. While I recognize the need for attention to environmental concerns and wilderness protection, I believe alternative management plans D and E hamper public access and do not reflect the management desires of local governments and U.P.-wide park enthusiasts.

These proposed wilderness designations will restrict motorized boat access to only Grand Sable Lake within the eastern end of the lakeshore. The designations will also endanger historic buildings and structures from the Michigan Wisconsin Consolidated Pipeline Camp in Beaver Basin that can never be replaced upon removal. These buildings hold cultural significance to local residents, and have been recognized by National Park Service staff as eligible for possible listing on the National Register of Historic Places.

2. I respectfully request that you consider alternatives C and A as you revise the General Management Plan for Pictured Rocks National Lakeshore. I believe these alternatives address the concerns of local residents and recreational enthusiasts while maintaining the pristine environmental and aesthetic qualities that make Pictured Rocks a year-round destination throughout the Midwest. Thank you for your consideration, and please do not hesitate to contact me directly regarding with any questions or concerns you may have in response to these suggestions.
- 3.

Sincerely,

  
MICHAEL A. PRUSI  
State Senator  
38<sup>th</sup> District

Cc: Alger County Board of Commissioners  
Congressman Bart Stupak  
Michigan Natural Resources Commission  
Munising City Commission

### Response to Michael Prusi letter

1. Please see response 1 to Congressman Stupak.
2. Please see response 1 to Congressman Stupak.
3. Only a two - stall garage remains from the Michigan Wisconsin Pipeline Camp in Beaver Basin. Further research (since the draft plan was released) indicates that it is ineligible for listing on the National Register of Historic Places. We added this finding to the final plan in the "Wilderness Study" section.

## COMMENTS

## RESPONSES



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

NOV 25 2003

REPLY TO THE ATTENTION OF

Ms. Karen Gustin  
Pictured Rocks National Lakeshore  
P.O. Box 40  
N8391 Sand Point Road  
Munising, MI 49862-0040

**Subject: Comments on the Draft Environmental Impact Statement for the Pictured Rocks National Lakeshore General Management Plan, Alger County, Michigan.**

Dear Ms. Gustin:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the National Park Service's (NPS) Draft Environmental Impact Statement (DEIS) for the **Pictured Rocks National Lakeshore General Management Plan, Alger County, Michigan**. Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. The CEQ's number for this DEIS is 030391.

The last comprehensive planning effort (general management plan) for Pictured Rocks National Lakeshore was completed in 1981. Much has occurred since 1981. Patterns and types of visitor use have changed, boundaries have been amended and changed, and the development of a scenic drive has been prohibited by recent legislation. Each of these changes has major implications for how visitors will access and use the National Lakeshore in the future.

General management concerns were identified by the NPS through its planning and scoping processes. The concerns were the extent to which visitor services and facilities, or administrative and support services can be provided without impacting natural and cultural resources.

The No Action Alternative describes a continuation of the existing management practices at Pictured Rocks National Lakeshore, and provides a baseline for evaluating the changes and impacts of the other alternatives.

In Alternative A, the management of the National Lakeshore would be very similar to existing management practices with a few exceptions. Administration and maintenance functions would be consolidated in new facilities near Munising and Grand Marais. A new campground would be provided in the Miners area, and paving County Road H-58 would be recommended. Alternative B was dropped from consideration.

## COMMENTS

## RESPONSES

Alternative C would provide an easier and more convenient way to visit the National Lakeshore. Vehicular access and/or improved pedestrian access would be provided to additional lakeshore area, features and significant cultural resources. Many roads would be paved and improved to increase areas of access to visitors.

Alternative E would propose much of the middle third of the National Lakeshore for designated wilderness. To accommodate possible increased use in the non-wilderness portions of the National Lakeshore, certain roads would be upgraded, and a new campground would be added. Operational facilities would be consolidated near Munising and Grand Marais.

Alternative D, the NPS's Preferred Alternative, would provide additional and more convenient access to significant National Lakeshore features, thus expanding opportunities for visitor use and enjoyment. Efforts would continue to restore the National Lakeshore to as natural a state as possible. Natural ecological processes would be allowed to occur, and restoration programs would be initiated where necessary. Federal lands in the Beaver Basin area would be proposed for designation as wilderness. About 18% of the National Lakeshore acreage would be proposed for designation as wilderness.

Having reviewed the DEIS, U.S. EPA rates Alternative D, the NPS's preferred alternative, as **LO - Lack of Objections**. Although Alternative E also provides for substantial wilderness designation and preservation, the Preferred Alternative would provide more economic benefit to Alger County. The LO rating indicates that we do not have concerns about the project impacts or amount of information the NPS has supplied in support of the management plan.

We appreciate the opportunity to review the DEIS. Please send only two copies of the final EIS to this office at the same time it is officially filed with our Washington, D.C. Office. If you have any questions, please call Joana Bezerra at (312) 886-6004, or send email to [bezerra.joana@epa.gov](mailto:bezerra.joana@epa.gov).

Sincerely,



Kenneth A. Westlake  
Chief, Environmental Planning and Evaluation Branch  
Office of Strategic Environmental Analysis

Enclosures (1): Summary of Rating Definitions

## COMMENTS

## RESPONSES

**SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION\*****Environmental Impact of the Action****LO-Lack of Objections**

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC-Environmental Concerns**

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

**EO-Environmental Objections**

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU-Environmentally Unsatisfactory**

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS state, this proposal will be recommended for referral to the CEQ.

**Adequacy of the Impact Statement****Category 1-Adequate**

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2-Insufficient Information**

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

**Category 3-Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

## COMMENTS

## RESPONSES



IN REPLY REFER TO:

### United States Department of the Interior

FISH AND WILDLIFE SERVICE  
East Lansing Field Office (ES)  
2651 Coolidge Road, Suite 101  
East Lansing, Michigan 48823-6316

October 31, 2003

Ms. Karen C. Gustin, Superintendent  
National Park Service  
Pictured Rocks National Lakeshore  
P.O. Box 40  
Munising, Michigan 49862-0040

Subject: Draft General Management Plan and Wilderness Study, Environmental Impact Statement (DEIS), at Pictured Rocks National Lakeshore

Dear Ms. Gustin:

We appreciate the opportunity to review and comment on your draft General Management Plan and Wilderness Study EIS at Pictured Rocks National Lakeshore (PIRO). This response is made pursuant to section 7 of the Endangered Species Act of 1973 (Act), as amended, (87 Stat. 884, 16 U.S.C. 1531 *et seq.*) Based on your analysis of effects on listed species in the DEIS, section 7

1.

consultation is necessary for this project. After you select the action alternative, but before the NEPA process is completed, you should complete a section 7 consultation with this office. Your Record of Decision for your EIS should address the results of section 7 consultation.

The proposed five alternatives, as described in your DEIS, are the no-action alternative, the preferred alternative, alternative A, alternative C, and alternative E. The alternatives present different ways to manage resources and visitor use and improve facilities and infrastructure at PIRO. The alternative ultimately selected will guide PIRO's natural, cultural, and visitor use management activities over the next 15 years.

#### Endangered Species Effects Determination and Section 7 Consultation Requirements

Section 7(a)(2) of the Act requires federal agencies to consider impacts to federally listed threatened and endangered species. Section 7 consultation with the USFWS is required for all federally funded, constructed, permitted, licensed, or otherwise authorized projects. According

2.

to our files, and data presented in your DEIS, four federally listed species are found at PIRO. These species are the federally endangered piping plover (*Charadrius melodus*) and the federally threatened gray wolf (*Canis lupus*), bald eagle (*Haliaeetus leucocephalus*), and Pitcher's thistle (*Cirsium pitcheri*). PIRO also owns a segment of shoreline in Grand Marais that is designated piping plover critical habitat.

### Response to U.S. Fish and Wildlife Service

1. The National Park Service initiated Section 7 consultation in September 1999. The Fish and Wildlife Service responded with a species list in an October 1999 letter. Given the length of time since the 1999 request, the National Park Service again consulted the Fish and Wildlife Service in a May 2001 letter requesting an update of the list, including proposed or candidate species and designated critical habitat or essential habitat that might occur at or near this locality. A response was received from Fish and Wildlife in June 2001 listing only the bald eagle (*Haliaeetus leucocephalus*) and Pitcher's thistle (*Cirsium pitcheri*) as threatened and that there was proposed piping plover critical habitat.
2. Please see response number 1. We added piping plover (*Charadrius melodus*) to table 6, List of Species of Concern at Pictured Rocks National Lakeshore. We have critical habitat on the beach of Lake Superior at Grand Marais, but the species has not been detected at the national lakeshore in more than 10 years.

## COMMENTS

## RESPONSES

3. As endangered species and critical habitat are found within the proposed action area, a determination of how the proposed project would affect listed resources (federally threatened and endangered species and designated critical habitat) is required. There are three conclusions that could be reached as a result of the determination: *no effect*, *not likely to adversely affect* and *likely to adversely affect*. A “*no effect*” determination means your assessment revealed that the proposed action would have no effect whatsoever on listed resources. A “*not likely to adversely affect*” determination is reached if the proposed action would have any beneficial, insignificant, or discountable effects, and a “*likely to adversely affect*” determination should result if any direct or indirect adverse effects can be identified that are not insignificant or discountable.

If your effects determination concludes that the project will have *no effect* on listed resources, you should document this in your file. A concurrence letter from our office is not needed. If your effects determination concludes that listed resources *may be affected* (positively or negatively) by the proposed action, you should initiate section 7 consultation with our office. If the effects determination concludes that listed resources are *not likely to be adversely affected* as a result of the proposed action, you must obtain concurrence from us through *informal* consultation. If, however, you determine that listed resources are *likely to be adversely affected* as a result of the proposed action, you should initiate *formal* consultation with our office.

Within the DEIS (p. 175) a discussion regarding likely impacts of the preferred alternative on species of concern is incorporated (similar discussions are provided for each alternative considered). Effects of the preferred alternative on bald eagle, gray wolf, and Pitcher's thistle, are briefly discussed. Effects determinations for piping plover and piping plover critical habitat were not incorporated.

4. When you request section 7 consultation with this office, we suggest that an effects determination is incorporated for piping plover and piping plover critical habitat, and that every determination should incorporate all potential direct, indirect, and cumulative effects. Information provided in the enclosed document titled “Guidance for Preparing Biological Assessments and Biological Evaluations” may help in developing your effects determination.
5. The table below is a summary of the discussion (p. 175) regarding impacts of the preferred alternative on listed resources, based upon our interpretation. The table provides, by species, the effects determination concluded, the reason for the determination, and what level of FWS involvement is required. With the limited information provided in the DEIS it would be difficult for us to concur with your determinations.

Species	Determination	Reasoning	FWS involvement
Bald Eagle	Not likely to adversely affect	Beneficial effects	Letter of concurrence
Pitcher's Thistle	Not likely to adversely affect	Beneficial effects	Letter of concurrence
Gray Wolf	Not likely to adversely affect	Insignificant or discountable effects?	Letter of concurrence
Piping Plover	No Determination	NA	Unknown at this time
Piping Plover Critical Habitat	No Determination	NA	Unknown at this time

3. Please refer to Appendix G: Biological Assessment for Threatened and Endangered Species. The National Park Service has stated what it proposes to do, listed species and critical habitat that potentially are known to occur in the action area, and analyzed impacts and cumulative impacts.

4. Please refer to comment 3 above.

5. Please refer to comment 3 above.

COMMENTS

RESPONSES

Endangered Species and General Natural Resource Management

We suggest that PIRO's responsibilities for listed species and critical habitat under section 7 of the Endangered Species Act (Act) be addressed in the DEIS. Section 7(a)(1) of the Act imposes an affirmative duty to conserve listed species on Federal agencies. Section 7(a)(1) directs all Federal agencies to proactively conserve listed species by carrying out programs aimed at their recovery.

6. Although not articulated in the DEIS, we are aware that PIRO staff is working proactively to protect and recover federally listed endangered species. These activities and planned future activities, should be incorporated into the DEIS. If this information is currently found in another publicly reviewed document then that document should be incorporated into the DEIS by reference.

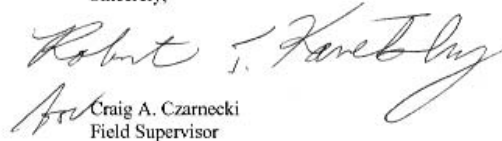
7. A discussion regarding natural resource management also appears to be lacking from the DEIS. It seems appropriate that this information be incorporated into the DEIS since the General Management Plan provides a framework for making decisions about and managing PIRO's resources over the next 15 years. This proposed natural resource management section should include information on how PIRO will manage aquatic and terrestrial resources. This section could also include endangered species management as discussed above. Again, if a publicly reviewed document focused on natural resource management already exists then this document should be incorporated into the DEIS by reference.

Inaccuracies in Federally Threatened and Endangered Species and Critical Habitat Information

8. While reviewing the DEIS we noticed several inaccuracies in the federal endangered species information presented in Table 6 and subsequent discussion on page 129. Attached is a document titled "Endangered Species Updates for PIRO DEIS" which details changes necessary to accurately reflect the status of federally listed species and critical habitat at PIRO. We recommend that you also contact the Michigan Department of Natural Resources to insure data regarding State listed species are correct.

We appreciate the opportunity to provide comments on your DEIS. Please refer any questions directly to Christie Deloria of our U.P. sub-office at (906) 226-1240 or [christie\\_deloria@fws.gov](mailto:christie_deloria@fws.gov).

Sincerely,

  
Craig A. Czarnecki  
Field Supervisor

Cc: Lyn MacLean, Twin Cities, MN (ES)

6. Please refer to comment 3 above.

7. Appendix B contains all servicewide mandates and polices for the management of natural resources. Most of these come directly from *NPS Management Policies 2001*. The lakeshore also operates under a National Park Service-approved "Resource Management Plan" for natural and cultural resources, which is available upon request from Pictured Rocks National Lakeshore.

8. Table 6: List of Species of Concern at Pictured Rocks National Lakeshore has been amended as follows:

*Changes:*

Gray wolf is state threatened

Peregrine falcon has been delisted at the federal level, no federal designation

Bald eagle is state threatened

*Additions:*

<i>Accipiter gentilis</i>	Northern goshawk	state species of concern
<i>Buteo lineatus</i>	Red-shouldered hawk	state threatened
<i>Dendroica cerulea</i>	Cerulean warbler	state species of concern
<i>Gavia immer</i>	Common loon	state threatened
<i>Potamogeton confervoides</i>	Alga pondweed	state species of concern
<i>Charadrius melodus</i>	Piping plover	federal/state endangered

## COMMENTS

## RESPONSES

**Endangered Species Updates for PIRO DEIS**  
Draft General Management Plan & Wilderness Study  
2003

Please update Table 6 (pg. 128) and text on pg. 129 to reflect the following information:

Gray Wolf

In March 2003, the gray wolf was reclassified as a threatened species under the Endangered Species Act (Act).

In winter 2003, 321 wolves were estimated to live in the Upper Peninsula.

Your use of critical habitat when describing wolf habitat within Pictured Rocks National Lakeshore (PIRO) could be misinterpreted. Critical habitat is a specific designation under the Act. Isle Royale National Park is the only area in Michigan which is designated critical habitat for gray wolves. We suggest not using the word critical when describing gray wolf habitat. Perhaps rework the sentence to read: "According to the Michigan Department of Natural Resources (MDNR 2000), the national lakeshore does not contain significant habitat for gray wolves as the lakeshore lacks a year-round food source."

Peregrine falcon

The peregrine falcon (*Falco peregrinus*) was removed from the federal list of threatened and endangered species in 2000. Due to delisting, the peregrine falcon no longer receives protection under the Act.

Great Lakes Piping Plover

Piping plover was discussed in the text on page 129, however, it was not included in your species of concern list presented in Table 6. The Great Lakes Piping plover is listed as an endangered species under the Act.

Critical habitat for piping plovers was designated in 2001. A segment of piping plover critical habitat in Grand Marais is owned by PIRO. This property is just north of the Grand Marais ranger station. Piping plovers nested on this property in 1992.

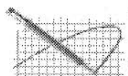
Pitcher's Thistle

The Recovery Plan for Pitcher's thistle was completed in 2002. The Pitcher's thistle population that occurs at Grand Sable Dunes is ranked as an "A" under NatureServe Element Global Ranking Criteria. An "A" rank suggests a dune size over 250 acres and a population of at least 5,000 individuals.



## COMMENTS

## RESPONSES



Tom Gilbert

10/31/2003 08:23 AM  
CST

To: piro\_gmp@nps.gov  
cc: Karen Gustin/PIRO/NPS, Fredrick Szarka/IATR/NPS  
Subject: Comments on Draft GMP

Official Correspondence Sent via Electronic Mail<?xml:namespace prefix = o ns =  
"urn:schemas-microsoft-com:office:office" />

<?xml:namespace prefix = st1 ns = "urn:schemas-microsoft-com:office:smarts" />U.S.

Department of the Interior  
National Park Service  
Ice Age and North Country  
National Scenic Trails  
700 Rayovac Drive, Suite 100  
Madison, Wisconsin 53711

L6017(NOCO)  
Pictured Rocks NL

October 28, 2003

Memorandum

To: Superintendent, Pictured Rocks National Lakeshore

From: Superintendent, Ice Age and North Country National Scenic Trails

Subject: Review and comments on the Draft General Management Plan/Wilderness Study/EIS

We appreciate the opportunity to review on the Pictured Rocks National Lakeshore Draft General Management Plan/Wilderness Study/Environmental Impact Statement. We have the following comments for your consideration.

### General Comments

We are generally very pleased with the attention the plan pays to the management of the North Country National Scenic Trail (NST). The National Trail Systems (NTS) Act is acknowledged and the North Country NST is shown on all maps and mentioned in several of the descriptions of facilities. However, there are additional places where we believe it would be appropriate to mention the trail and/or to clearly state the desire of the National Park Service (NPS) to maintain the primitive character of the trail and that it be managed for hiking and backpacking.

### Specific Comments

1. Page 3—The North Country NST is not mentioned in the Purpose and Need section. As a

### **National Park Service—North Country National Scenic Trail**

1. We added the North Country National Scenic Trail to the "Purpose and Need" section.

## COMMENTS

## RESPONSES

1. congressionally authorized area administered by the NPS, it would seem appropriate to mention it in "The Region" section along with other NPS- and Federally-administered areas.
2. Pages 14 and 17-19—The NTS Act is appropriately referenced on page 14. It might also be appropriate to include in the table on pages 17-19 the fact that the NTS Act requires that motorized use of the North Country NST is prohibited, and that the policy of the NPS is that the trail be managed primarily for hiking and backpacking in accordance with the following Statement of Purpose and Desired Future Condition adopted by the NPS and USDA-Forest Service on November 6, 1998.

2. We added your suggestion at the end of the table.

## NORTH COUNTRY NATIONAL SCENIC TRAIL

## Statement of Purpose / Desired Future Condition

The North Country Trail, conceived of in the 1960s, was established as a National Scenic Trail in 1980 under the National Trails System Act (16 U.S.C. 1241 et seq.). According to the Act, the North Country Trail is:

- To be a trail of approximately thirty-two hundred miles, extending from eastern New York State to the vicinity of Lake Sakakawea in North Dakota, following the approximate route depicted on the map identified as "Proposed North Country Trail—Vicinity Map" in the Department of the Interior "North Country Trail Report," dated June 1975;
- To be so located as to provide for its maximum outdoor recreation potential;
- To be so located as to provide for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which it passes;
- To be administered by the Secretary of the Interior and operated, developed, and maintained in conjunction with other Federal Agencies, States, their political subdivisions, adjacent landowners, and private organizations and individuals; and
- To be administered in a manner that encourages and assists volunteer citizen involvement in the planning, development, maintenance, and management of the Trail.

The Trail will be administered and managed as a path whose use is primarily for hiking and backpacking. Management of the North Country National Scenic Trail is also affected by other Federal legislation, including, but not limited to, the 1916 Organic Act, the National Forest Management Act, the Wilderness Act, the National Environmental Policy Act, the National Historic Preservation Act, the Wild and Scenic Rivers Act, and the Endangered Species Act. Numerous regulations, policies, plans, and cooperative agreements have been established to

## COMMENTS

## RESPONSES

provide more specific guidance on management and protection of the North Country Trail.

3. Pages 45-49—This same point might be appropriate to include within the Management Prescriptions section. For example, under Casual Recreation it might be appropriate to include a specific statement that bicycle use on trails is not permitted. Under Primitive, the list of appropriate activities mentions nonmotorized activities that would be permitted, which does not include bicycling, but it does not specifically state that bicycling is not appropriate. Under Mixed Use, the appropriate facilities list includes primitive roads and trails. The list of activities permitted includes motorized and non-motorized uses, including all-terrain vehicles and bicycles. While it is clear in other sections of the plan that mixed use trails do not include hiking trails, and while under the Preferred Alternative very little of the North Country NST would lie in a Mixed Use zone, there currently are efforts by the mountain biking community to open the trail to bicycle use and any such opening in NPS policy will be exploited in making their case to gain access to the trail. The term primitive trail should be clearly defined to exclude motorized and bicycle use on hiking trails even in Mixed Use areas.
4. Pages 50-89—We found it curious that the North Country NST is specifically mentioned only under the No Action Alternative. We would suggest including, especially under the Preferred Alternative, a reference to preserving its character and use as a premier hiking and backpacking trail within all of the various management prescriptions areas.
5. Pages 140-141—The North Country NST is mentioned under the section on Drive-in Camping, but it would also seem appropriate to mention it under the Backcountry Camping section, as it is the primary access route to many if not most of the hike-in backcountry campsites.
6. Page 144—The North Country NST is very well described in the Hiking and Backpacking section as not only an important element of the National Lakeshore, but its national scope and significance as well. It might be appropriate to also include mention that it is one of only eight NSTs in the nation, and that when it is completed it will be the longest hiking trail in the nation (4,200 miles).
7. Page 222—Under the List of Agencies and Organizations Receiving a Copy of the Draft Plan, our “park”—Ice Age and North Country National Scenic Trails—should be listed under the National Park Service.

We understand and appreciate the enormous amount of work that has gone into the planning process and bringing it to this point of a draft plan. We also appreciate the opportunity to provide these comments and your consideration of them in the finalization of the plan and EIS. Please contact us if you have any questions about our comments.

/s/ Thomas L. Gilbert

Tom Gilbert

3. Under the casual recreation and primitive prescriptions we added "Bicycle use would not be permitted on trails within the shoreline zone." The National Park Service cannot dictate appropriate trail use on private property in the inland buffer zone. Under the mixed use prescriptions we added "Bicycle and motorized use on the North Country National Scenic Trail would be prohibited."
4. We added at the end of each alternative concept (no action, preferred, A, C, and E) the following sentence: "Continue to preserve the North Country National Scenic Trail's character and use as a premier hiking and backpacking trail."
5. We added "accessed by the North Country National Scenic Trail" to the first sentence.
6. We added "The North Country National Scenic Trail is one of only eight National Scenic Trails in the nation, and when completed it will be the longest hiking trail in the nation (4,200 miles)."
7. We added "Ice Age and North Country National Scenic Trails" to the list.

## COMMENTS



STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

LANSING

JENNIFER M. GRANHOLM  
GOVERNOR

November 17, 2003

Ms. Karen C. Gustin, Superintendent  
Pictured Rocks National Lakeshore  
P.O. Box 40  
Munising, MI 49862-0040

Dear Ms. Gustin:

Thank you for the opportunity to comment on the draft revision of the Pictured Rocks National Lakeshore general management plan. We are pleased to offer the following comments on the designated preferred alternative.

We recognize the need for a diversity of recreational opportunities, including wilderness experiences, however, we also must consider the impacts to recreational opportunities. We believe that the preferred alternative, which proposes wilderness designation for Beaver Basin, will significantly decrease recreational opportunities for fishing by prohibiting the use of motorized boats on the Beaver Lakes. It is our understanding that wilderness designation does not preclude the use of electric motors on fishing boats. Restricting lake use to electric motors or human powered vessels may be a suitable compromise to address recreational use.

In addition, our Fisheries Division has expressed concern that wilderness designation will impact its ability to monitor fish populations on the Beaver Lakes and Seven Mile Creek, using current survey protocols. Seven Mile Creek has been an area of emphasis for restoration of coaster brook trout. Evaluation of restoration efforts is critical for improving success of future restoration efforts. We understand that you may be willing to develop a Memorandum of Understanding that would permit the continued use of our standard survey methods. From our review of the wilderness designation, it does not appear that such exemptions are allowed. Thus, we are not willing to support wilderness designation until this issue can be resolved in a manner that is allowed within this designation.

We are also concerned about further improvements to County Road H-58. Improvements of this road will likely increase off-road vehicle and other human activities in the Kingston Plains area, an ecosystem that is sensitive to overuse. Improvement of the road may also lead to increased development which will negatively impact wildlife resources of the area. We would agree that any improvements to H-58 should maintain a low-speed road that preserves the forest canopy, rustic character, scenic qualities, and archeological resources wherever possible.

## RESPONSES

## Department of Natural Resources

1. In response to public comment, the preferred alternative was changed to allow electric motors on Little Beaver and Beaver Lakes.

A query on the Michigan Department of Natural Resources website produced these results:

Within 25 miles of the city of Munising there are 32 public access sites, not including NPS Beaver and Sable Lake access sites (7 type 1 ramps, 6 type 2 ramps, 13 type 3 ramps, and 6 type 4 launch sites). Beaver Lake represents 3.6% of all water bodies with drive-in public access. All of these are water bodies allowing motorized use.

Within 50 miles of the city of Munising there are 112 public access sites, not including NPS Beaver and Sable Lake access sites (50 type 1 ramps, 16 type 2 ramps, 20 type 3 ramps, and 26 type 4 launch sites). This includes access sites on major rivers. All of these allow motorized use except for sections of the Fox River in Schoolcraft County. Beaver Lake represents 1.1 % of water bodies with drive-in public access.

The numbers include boat ramps for Lake Superior.

## Ramp Categories:

- Type 1: Hard surface ramp — drive-in access
- Type 2: Hard surface ramp on limited size water body — drive-in access
- Type 3: Gravel surface ramp — drive-in access
- Type 4: Carry down launch site — drive-in but no boat ramp

2. Scientific research can occur in wilderness. Per *NPS Management Policies 2001*, 6.3.6.1, "Scientific activities are to be encouraged in wilderness. Even those scientific activities (including inventory and monitoring and research) that involve a potential impact to wilderness resources or values (including access, ground disturbance, use of equipment, and animal welfare) should be allowed when the benefits of what can be learned outweigh the impacts on wilderness resources or values. However, all such activities must also be evaluated using the minimum requirement concept and include documented compliance that assesses impacts against benefits to wilderness."

Natural Resource Commission  
No substantive comments.

## COMMENTS

## RESPONSES

Ms. Karen C. Gustin

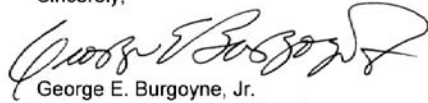
-2-

November 17, 2003

Visitors to this area comment on the natural resource and cultural/historical values of the area. The Lakeshore is uniquely situated to educate residents and visitors on the importance and context of landscape-level planning and processes, incorporating concepts like the buffer zone and mutually compatible uses. We commend efforts to ensure all factors are considered, and ask that concerns about consequences of wilderness designation be addressed before a final decision is made.

Again, thank you for the opportunity to participate in the planning process.

Sincerely,



George E. Burgoyne, Jr.  
Resource Management Deputy  
517-373-0046

cc: Ms. Rebecca A. Humphries, DNR  
Dr. Kelley Smith, DNR

## COMMENTS

## RESPONSES



R. M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
NATURAL RESOURCES COMMISSION  
LANSING

October 9, 2003

Ms. Karen Gustin  
National Park Service  
P.O. Box 40  
Munising, MI 49862

Dear Ms. Gustin:

During the September 12, 2003 meeting of the Michigan Natural Resources (NRC), the following resolution was unanimously adopted by the NRC:

**Pictured Rocks National Lakeshore**

Commissioner Madigan made a motion, supported by Commissioner Campbell, opposing the National Park Service proposal to designate Beaver and Little Beaver Lakes as "wilderness areas," and the NRC recommends that any regulations changes should not be made without DNR Fisheries Division agreement. Motion unanimously carried.

Please feel free to contact me if you have questions or wish to discuss this issue further.

Sincerely,

*John Madigan*  
John Madigan, Commissioner  
Natural Resources Commission  
906-632-3337

| Act       | FILED | Date |
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OCT 15 2003

Michigan DNR

## COMMENTS

## RESPONSES

### Alger County Resolution Concerning the Pictured Rocks National Lakeshore General Management Plan Wilderness Study and Environmental Impact Statement

**WHEREAS**, the Pictured Rocks National Lakeshore is entirely within the boundaries of Alger County and comprises a significant amount of real property within the County of Alger, and

**WHEREAS**, the National Park Service has prepared a draft revision of its General Management Plan for the National Lakeshore proposing changes that will have a significant impact on the commerce and recreation of the citizens of Alger County, and

**WHEREAS**, a Preferred Alternative has been chosen and comments on the Draft Management Plan, Wilderness Suitability Study and Environmental Impact Statement are being solicited, and

**WHEREAS**, wilderness as defined by the Wilderness Act of 1964 are areas "where the earth and its community of life are untrammelled by man," and that Beaver Basin is the section of the lakeshore most heavily "trammelled by man," making it unsuitable for a wilderness area, and

1. **WHEREAS**, the Preferred Alternative recommends creation of a wilderness area in the Beaver Basin, of which would further restrict vehicle access and place new restrictions on motorized boat access to the lakeshore, and
2. **WHEREAS**, if the wilderness designation is made for Big and Little Beaver Lakes, only Grand Sable Lake in the eastern end of the lakeshore will be available for motorized boat access, and
- 253 3. **WHEREAS**, the buildings and structures remaining from the Michigan Wisconsin Consolidated Pipeline Camp in Beaver Basin have been recognized by the National Park Service whose own staff recommends further assessment of these "cultural landscapes that might be eligible for listing on the National Register of Historic Places" and yet, under the wilderness designation, those buildings and structures not already destroyed by the National Park Service would be razed, depriving many local residents of important ties to their past and,

**WHEREAS**, commercial tours of the Pictured Rocks National Lakeshore have operated since 1845, and because the most dramatic and least destructive way to see the Lakeshore is from the lake or by air, and

4. **WHEREAS**, an estimated 90% of visitors to the lakeshore access the park by vehicle and only 10% on foot, and owing to its unique geography, the detrimental impact of foot traffic far exceeds that of vehicle traffic, and where the creation of a wilderness area will attract even more hikers and backpackers resulting in greater degradation of the resource and a negative impact on Alger County's tourist based economy.

**THEREFORE, BE IT RESOLVED**, that the Alger County Board of Commissioners unanimously opposes the Preferred Alternative contained in the Draft General Management Plan and any other alternative that creates any wilderness area;

**FURTHERMORE**, the Alger County Board Commissioners endorses Alternative C of the Management Plan or any alternative that improves the roads within, and increases vehicle access to the Park and preserves motorized access to the shoreline while preserving the cultural resources of the Beaver Basin.

Dated: September 8, 2003

Joseph P. VanLandschoot, Chairman  
Alger County Board of Commissioners  
101 Court Street, Munising, MI 49862

### Local Governments

#### Alger County Resolution

1. Please see response 1 to Congressman Stupak.
2. Please see response 1 to Michigan Department of Natural Resources.
3. Please see response 3 to State Senator Michael Prusi.
4. We do not agree that additional hikers and backpackers would have a negative impact on Alger County's tourist-based economy. In summer 2001, the University of Idaho conducted a Visitor Services Project at Pictured Rocks and found that national lakeshore visitors spent \$14.8 million in the local area (within 60 miles of the national lakeshore) and generated \$4.6 million in direct personal income (wages and salaries) for local residents.

COMMENTS

RESPONSES

**BURT TOWNSHIP BOARD**

ALGER COUNTY  
P.O. BOX 430  
GRAND MARAIS, MI 49839-0430  
906-494-2381  
Fax: 906-494-2627



Lee Durrwachter, Supervisor  
Lori Savage, Clerk  
James T. Seibert, Treasurer

Lois Leavenworth  
Rose Benmark  
Trustees

| Act          | Filed | Date |
|--------------|-------|------|
| Supd         |       |      |
| Secy         |       |      |
| Admin        |       |      |
| Mail         |       |      |
| Interp       |       |      |
| Veh. Ins     |       |      |
| Science      |       |      |
| Grand Marais |       |      |
| Info Center  |       |      |
| City         |       |      |
| Other        |       |      |

October 29, 2003

Karen Gustin  
PRNL  
PO Box 40  
Munising, MI 49862-0040

Dear Karen,

At last night's special meeting of the Burt Township Board, we discussed the General Management draft for PRNL. Some of us had attended meetings during which you and others explained the alternatives and answered questions. Although we have been trying for some time to come to an agreement on which alternative we could support, we were unable to come to a majority decision let alone a consensus. We do not support "no action" either.

I was assigned to write to you informing you of our non-decision, but to comment on a few ideas that did have majority or unanimous support. We agreed that handicap access should be a priority at several locations; possibly scheduled trips to these locations using a small bus or other suitable vehicle. We do not want to see the Beaver Lakes prohibit the use of all motors, we believe electric trolling motors and small gas motors should be allowed. We also agreed that more planned events for the slow times, (April, May, early June, late September, October and November), would benefit our businesses. We believe that from late June through early September, our facilities are saturated and any additional traffic may create problems.

Our main sticking points were the paving of H-58 and restriction of use by the public, especially the year round residents. In fact most of us would like to see more access for locals including improvements at Sable Lake. If Burt Township can be of further assistance, please let us know.

Sincerely;  
JT Seibert

**Burt Township Board**

1. Handicap access is provided to the Chapel area on a reservation fee basis through AlTran, the local transportation service.
2. In response to public comment, the preferred alternative was changed to allow electric motors on Little Beaver and Beaver Lakes. Due to the noise and potential for pollution, gasoline motors will be prohibited.
3. Planned events are a park programming decision and are not a general management plan decision.



## COMMENTS

## RESPONSES



MINER'S CASTLE

### CITY OF MUNISING, MICHIGAN

100 West Munising Avenue • Munising, Michigan 49862

CITY MANAGER  
PHONE (906) 387-2095  
TDD (800) 649-3777

CITY CLERK  
PHONE (906) 387-2246  
FAX (906) 387-4512

| Act                                      | PIRD | Date |
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AUG 20 2003

August 19, 2003

Karen C. Gustin  
Pictured Rocks National Lakeshore  
P.O. Box 40  
Munising, MI 49862

Dear Karen Gustin,

Please find enclosed a resolution regarding the Pictured Rocks National Lakeshore General Management Plan, Wilderness Study and Environmental Impact Statement, unanimously approved by the Munising City Commission at a regular meeting August 18, 2003.

Sincerely,

*Sue Roberts*

Sue Roberts,  
City Clerk

"Gateway to the Pictured Rocks National Lakeshore"

Equal Opportunity Provider and Employer

## COMMENTS

## RESPONSES

**City of Munising Resolution Concerning the  
Pictured Rocks National Lakeshore General Management Plan,  
Wilderness Study and Environmental Impact Statement**

Whereas, The Pictured Rocks National Lakeshore abuts the City of Munising to the East and comprises 20% of the real property within the Corporate boundaries of the City and,

Whereas, the National Park Service has prepared a draft revision of it's General Management Plan for the Park proposing changes that will have a significant impact on the commerce and recreation of the citizens of Munising and Alger County and,

Whereas, a Preferred Alternative has been chosen and comments on the Draft Management Plan, Wilderness Suitability Study and Environmental Impact Statement are being solicited and,

1. Whereas, Wilderness as defined by the Wilderness Act of 1964 are areas "where the earth and it's community of life are untrammelled by man," and that Beaver Basin is the section of the park most heavily "trammelled by man," making it unsuitable for a Wilderness Area and,

2. Whereas, the Preferred Alternative recommends creation of a Wilderness Area in the Beaver Basin, the impact of which would further restrict vehicle access and place new restrictions on motorized boat access, to the Lakeshore and result in further destruction of the cultural resources in the Beaver Basin and,

3. Whereas, the buildings and structures remaining from the Michigan Wisconsin Consolidated Pipeline Camp in Beaver Basin have been recognized by the National Park Service whose own staff recommends further assessment of these "cultural landscapes that might be eligible for listing on the National Register of Historic Places" and yet, under the preferred alternative, many of those buildings and structures not already destroyed by the National Park Service would be razed under a Wilderness designation depriving many local residents of important ties to their past and,

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4. Whereas, commercial tours of the Pictured Rocks National Lakeshore have operated out of Munising Bay since 1845, and because the most dramatic and least destructive way to see the Lakeshore is from the lake, and as commercial and recreational boaters have enjoyed motorized access to the entire Lakeshore since the invention of the internal combustion engine, and because designation as Wilderness area would restrict motorized access, and

5. Whereas, an estimated 90% of visitors to the Lakeshore access the park by vehicle and only 10% on foot, and owing to its unique geography, the detrimental impact of foot traffic far exceeds that of vehicle traffic, and where the creation of a Wilderness Area will attract even more hikers and backpackers resulting in greater degradation of the resource and a negative impact on the city's tourist based economy,

Therefore; be it resolved that the Munising City Commission unanimously opposes the Preferred Alternative contained in the Draft General Management Plan and any other alternative that creates any Wilderness Area, decreases vehicle and motorized boat access to the National Lakeshore and further destroys the Park's cultural resources; furthermore the Munising City Commission endorses Alternative C of the Management Plan or any alternative that improves the roads within, and increases vehicle access to, the Park and preserves motorized access to the shoreline while preserving the cultural resources of the Beaver Basin.

Rod DesJardins, Mayor

8/19/03

**City of Munising Resolution**

1. The Wilderness Study concluded that the Beaver Basin met the criteria for proposed wilderness. NPS Director's Order 41 "Wilderness Preservation and Management" in section 6.2 states "Lands that have been logged, farmed, grazed, mined, or otherwise utilized in ways not involving extensive development or alteration of the landscape may also be considered suitable for wilderness designation if, at the time of assessment, the effects of these activities are substantially unnoticeable or their wilderness character could be maintained or restored through appropriate management actions."

2. Please see response 1 to Michigan Department of Natural Resources.

3. Please see response 3 to State Senator Michael Prusi.

4. In response to public comment on the draft, the management prescription on the 8.5-mile stretch of Lake Superior from Spray Falls to Sevenmile Creek was changed from primitive to casual recreation, which allows for motorized boat use.

5. Please see response 4 to the Alger County resolution.

## COMMENTS

## RESPONSES



### TOWNSHIP OF MUNISING

ALGER COUNTY, MICHIGAN  
P.O. Box 190  
WETMORE, MICHIGAN 49895  
PHONE (906) 387-4404  
Fax (906) 387-5719  
MI TTD 800-649-3777

Dan Wilson, Supervisor  
June Nettleton, Clerk  
Bonnie Fulcher, Treas.  
Selina Balke, Trustee  
Lisa Howard, Trustee

#### RESOLUTION

WHEREAS: The United States Department of Interior, Pictured National Lakeshore Park is seeking comments on a proposed General management Plan-Wilderness Study AND

WHEREAS: Alger County already has two wilderness areas-- Big Island Lake and Rock River Canyon, which the Munising Township Board feels are under Utilized AND

WHEREAS: it is the consensus of said Board that additional wilderness areas would decrease the recreational and economic opportunities in our community: NOW

THEREFORE BE IT RESOLVED: The Munising Township Board, at a regular scheduled meeting by unanimous vote, went on record supporting the proposed General Management Plan, Alternative C.

DATE: 9-2-30

June Nettleton, Clerk



Munising Township is an Equal Opportunity Employer. To file a complaint of discrimination, write: Township of Munising, Alger County Michigan, P.O. Box 190, Wetmore, MI 49895 or call (906) 387-4404

### Township of Munising Resolution

1. Please see response 1 to Congressman Bart Stupak.

1.

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## COMMENTS

## RESPONSES

October 28, 2003

Karen Gustin  
Pictured Rocks National Lakeshore  
P.O. Box 40  
N8391 Sand Point Road  
Munising, MI 49862-0040

**Re: Pictured Rocks National Lakeshore Draft General Management Plan and  
Wilderness Study Environmental Impact Statement**

Dear Ms. Gustin:

On behalf of the members and supporters of Bluewater Network, please accept the following comments on the General Management Plan for Pictured Rocks National Lakeshore. Bluewater Network is a national organization that strives to champion innovative solutions and inspire individuals to protect the earth's finite and vulnerable ecosystems.

We commend the Park Service for producing the GMP for Pictured Rocks and for proposing to preserve areas of the lakeshore as wilderness for current and future visitors. Wilderness areas provide visitors an opportunity to experience the lakeshore in a setting that eliminates the noise and pollution of motorized craft. Our concerns regard the continued use of high-polluting, noisy, and wildlife-disturbing personal watercraft, snowmobiles, and two-stroke outboard engines within the boundaries of the lakeshore.

**Proposed wilderness**

The Wilderness Act of 1964 defines wilderness as "an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." As such, designated wilderness areas do not allow the use of motorized craft such as personal watercraft, snowmobiles, and motor boats. The intention of the wilderness act was to provide citizens with areas of refuge and sanctuary from everyday life with "outstanding opportunities for solitude or a primitive and unconfined type of recreation." A side effect of this policy is that wilderness areas are not subject to the pollutants, noise and harmful impacts to wildlife that motorized thriftercraft pose. Wilderness designation provides significant long-term benefits for an area, especially considering how far and few between wilderness experiences are for Americans today. Bluewater Network therefore supports the wilderness proposal outlined in alternative E, which proposes to designate 18,063 acres (approximately 25 percent) of the lakeshore as wilderness.

**Noise**

It is appropriate that the Park Service pursue wilderness designation for a portion of Pictured Rocks since, as the GMP states, "public comments received on the preliminary draft alternatives indicate that many visitors are seeking a quiet, nature-based experience when visiting the national lakeshore and man-made noise that carries over long distances

## COMMENTS

## RESPONSES

is incompatible with that expectation.” Designated wilderness helps to provide a quiet, nature-based experience by excluding the sources of noise that most visitors find bothersome. However, due to the proximity of the proposed wilderness area to motorized uses inside and out of the park, noise is likely to be a part of the wilderness experience in Pictured Rocks, counter to the intention of the wilderness act.

Bluewater Network opposes the use of personal watercraft, snowmobiles, and two-stroke outboard motors in national park areas. We recommend that if Pictured Rocks is going to permit these activities within the boundaries of the lakeshore, that only the quietest machines be used. Two-stroke engines on personal watercraft, snowmobiles, and outboard motors are significantly louder than four-stroke models currently on the market. While the Park Service clearly does not have jurisdiction over adjacent lands and waterways (the Park Service can do next to nothing to affect the sounds of chainsaws on adjacent lands or the noise from personal watercraft on Lake Superior), the agency has an obligation under the Organic Act, and if proposed, the Wilderness Act, to ameliorate the ability of visitors to enjoy the natural soundscape of the lakeshore. The Park Service has demonstrated an ability to address these noise sources by outlining mitigation measures to reduce the sound of the public address system on tour boats operating on Lake Superior. Mitigation measures should also be put in place for noisy machines that are permitted to operate in the park. The most effective way for the Park Service to do this would be to allow only four-stroke powered snowmobiles, personal watercraft and outboard motors in the lakeshore boundaries.

The draft EIS makes no mention of all-terrain vehicle (ATV) use at the lakeshore. Bluewater Network opposes the use of ATVs in national park units, but if ATV use is permitted in the lakeshore, they should be restricted to high standard gravel and paved surfaces. ATVs can have severe environmental impacts on backcountry areas and beaches and these sensitive areas should be protected from their use.

To the extent possible, we also encourage the Park Service to employ the National Park Air Tour Management Act of 2000 to mitigate or eliminate new and existing air tours occurring directly over the lakeshore, as outlined in the draft EIS.

### Impacts to air and water resources

The two-stroke engines found on most personal watercraft, snowmobiles and outboard motors also have detrimental impacts to air and water resources in the lakeshore. By design, two-stroke engines dump between 25 and 30 percent of their fuel (a gas and oil mixture) unburned into the environment. This pollution has been shown to cause significant damage to air and water quality. The National Academy of Sciences (NAS) recently reported in *Oil in the Sea III: Inputs, Fates, and Effects*, that two-stroke engine pollution has a major impact on water and biological resources. In particular, the research reported that even minor, short-term spills like the kind generated by two-stroke engines can cause detrimental damage to the energetic and biosynthetic processes and immune systems of aquatic wildlife, as well as their structural development and reproduction.

## Organizations

### Bluewater Network

1. ATV use is addressed in the mixed use management prescription in chapter 2. It states under “Appropriate Activities or Facilities” that “Motorized and nonmotorized transportation would be acceptable and could include all-terrain vehicles, bicycles, snowshoes, horses, dog sleds, motorcycles and snowmobiles.” The mixed use prescription is applied primarily in the privately owned inland buffer zone.

## COMMENTS

## RESPONSES

At parks such as Lake Mead and Glen Canyon the Park Service has decided to eliminate two-stroke motors by the start of the next decade. Some states have already set aggressive timetables for eliminating two-stroke engines. For example California adopted regulations that prohibit the distribution of conventional two-stroke engines beginning with the 2004 model year. In light of these actions, all of the major marine engine manufacturers now produced engines with cleaner technologies. In some cases, these new engines are 95 percent cleaner than conventional motors. Given the lasting damage these engines cause, strong state action, and industry's willingness to produce cleaner products, we believe it unreasonable to allow the continued use of conventional two-stroke engines in the national park system. While we commend the Park Service for encouraging snowmobile and personal watercraft enthusiasts to use the cleaner and quieter four-stroke machines in the lakeshore, we believe the Park Service should take this opportunity to implement a phase-out of two-stroke machines at the Pictured Rocks

2.

**The precedent: Yellowstone and snowmobiles**

Currently, a proposed rule for winter use at Yellowstone National Park is setting a precedent for managing motorized recreational use in the national park system. The rule requires snowmobiles that enter the park to have the best available technology to ensure that the machines do not create unnecessary pollution and noise while in the park. In creating the proposed rule for Yellowstone, the Park Service did not set out to regulate the snowmobile industry per se. Rather, the goal was to ensure that the over snow vehicles that entered the park met the "best available technology" standard for reduced noise and emission pollution. The best way for Pictured Rocks National Lakeshore to reduce noise and pollution from snowmobiles is to prohibit their operation. However, if snowmobile, personal watercraft, and outboard motors are going to continue to operate in the park we would ask that the Park Service require that they are operated by four-stroke engines. This 15-year general management plan provides the Park Service with the

3.

perfect opportunity to implement forward-thinking regulations to ensure that the visitors to the lakeshore are able to enjoy the quiet, clean, and peaceful experience that they expect.

**Other inappropriate activities**

The Park Service's history is filled with examples of inappropriate activities that are often initially overlooked because there are only a few users and their impacts seem minimal. Over time the number of users can grow and become a major problem for park management and a threat to park resources. Across the country, the Park Service has struggled to regulate several activities deemed inappropriate in a national park unit, including bear shows, hunting, and base jumping. There are currently several water base activities that are of questionable validity for a national park setting, including solo water ski machine, para-sailing, submersibles, and hovercraft. The lakeshore should enact a preemptive ban on these types of activities to ensure that when a hobby becomes a fad, it does not create a headache for the managers and visitors to Pictured Rocks.

4.

**Impacts of global warming on Pictured Rocks National Lakeshore**

We are concerned that the Park Service neglects to study the impacts of global climate change upon park resources and wildlife, let alone set forth planning to mitigate change:

2. The National Park Service would continue to support the development and use of best available technology for both snowmobiles and personal watercraft. Use of snowmobiles and personal watercraft would continue to be restricted at the national lakeshore. Snowmobiles are restricted to roads traveled by vehicles in the summer. The National Park Service is unable to enforce a ban of snowmobiles on county-owned roads. Personal watercraft use is restricted to designated launch sites (currently Sand Point) and on Lake Superior within the national lakeshore boundary from the western boundary up to the east end of Miners Beach. Personal watercraft users would be allowed to beach their craft on Miners Beach. Personal watercraft would not be allowed to launch or operate elsewhere in the national lakeshore.
3. Please see response 2.
4. These activities do not currently occur at Pictured Rocks National Lakeshore. The casual recreation management prescription for the Lake Superior portion of the national lakeshore describes resource condition and character, visitor experience, and appropriate activities or facilities that could occur in that area. As new uses occur at the national lakeshore, staff would evaluate their impact against the management prescription and determine whether that use is consistent with the intent of the management prescription.

## COMMENTS

## RESPONSES

as a resulting of rising global temperatures. Over the past 100 years, emissions of greenhouse gas pollution have led to increased global temperatures of more than 1°F, an unprecedented event in the last 1,000 years. Scientists worldwide predict that the pace of global climate change will accelerate over the next century and impact ecosystems with increasingly dramatic results. Average global temperature increase is projected to result in reduced water availability, increased catastrophic wildfires and storms, and habitat impacts that could wipe out entire species and ecosystems. Scientists predict a rise in sea level of up to 2.89 feet as a result of projected global temperature increases. Coupled with increasingly severe storm events, a sea level rise of this magnitude will reshape coastlines and submerge low-elevation islands entirely in both the U.S. and abroad. These global climate change impacts will occur so rapidly that many plant and wildlife species will not survive.

Pictured Rocks will not be immune to these impacts. For example, the lakeshore's diverse ecosystem could be altered, with warmer temperatures causing severe storms, drought, and a rise in the level of Lake Superior. Decreased snow pack and early snowmelt could cause flooding of streams and creeks, increasing lake sediment. The Park Service should encourage further study of global warming impacts and incorporate a plan for mitigation measures from such impacts in the Pictured Rocks GMP.

### Public/private partnerships

While Bluewater Network encourages the Park Service to reach out to all interested parties regarding park management, we are deeply concerned about the establishment of formal partnerships. All too often, partnership agreements lead to misunderstandings at best and, at worst, an attempt by these outside interests to circumvent or prevent necessary management actions. Formal partnership agreements lead special interest groups to develop expectations that their desires will be fully accommodated. When they are not, the partnered group can paint the Park Service as "non-cooperative" or lead the press and public to believe that the so-called partnership was a token political arrangement. The Park Service's trouble with so-called "cooperating agencies" in the Yellowstone/Grand Teton Winter Use Management Plan process is a prime example of the many problems that surround partnership agreements.

Bluewater Network is also concerned with the disturbing trend by federal agencies to relinquish more control over resource management decisions to so-called partner local citizen advisory committees. While Bluewater Network supports full citizen involvement in national park management, the creation of an advisory committee and the potential recommendations of such do not release the Park Service from its statutory and administrative mandates to protect and preserve park resources and wildlife. Judicial reviews of "local control" committees at units such as Niobrara National Scenic River have rendered similar opinions.

At a minimum, before the Park Service at Pictured Rocks enters into partnership with any outside interest, we recommend that the preferred alternative of the final GMP include strong guidelines and policies regarding partnership agreements. First, except where required by federal law, the Park Service should make clear to any potential partner that

5. Global warming is beyond the scope of this general management plan.

6. Pictured Rocks National Lakeshore does not have an advisory committee.

7. Increasingly, partnerships are becoming an effective means for the National Park Service to fulfill its mission and foster a shared sense of stewardship that is so crucial for the future. Partnerships are not mentioned specifically in *NPS Management Policies 2001* or in a Director's Order, but guidance on partnerships can be found on the National Park Service website [www.nps.gov/partnerships](http://www.nps.gov/partnerships). This serves as guidance for parks until more formal guidance can be prepared.

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the agency alone has final say on all management decisions regarding park resources and wildlife. The agency should make it expressly clear that "partnership" agreements do not release the agency from its legal mandates (in particular the Organic Act requirement) to leave park resources unimpaired. Next, the Park Service should make clear that any partnership agreement will confer no right of control or decision making power over the management of park resources and wildlife, nor any control or decision making power over the development of park structures or facilities. The Park Service should also spell out that partnership agreements confer no right to advertise inside park boundaries. Finally, all partnership agreements should be made available for public review.

Thank you for the opportunity to comment.

Sincerely,



Carl Schneebeck  
Public Lands Campaign Associate



## COMMENTS



Public Employees for Environmental Responsibility

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Hearing Officer  
c/o Ms. Karen Gustin  
National Park Service  
Pictured Rocks National Lakeshore  
PO Box 40  
Munising, MI 49862

September 2, 2003

Dear Hearing Officer:

By this letter Public Employees for Environmental Responsibility (PEER) hereby submits its comments on the wilderness study for Pictured Rocks National Lakeshore. We request that the Hearing Officer include these comments in the official record of the public hearing and as in the analysis of comments in the final environmental impact statement for the wilderness study.

PEER requests that the National Park Service (NPS) adopt Alternative E with one significant modification. Under Alternative E, 18,400 acres, or 26% of the park, would be preserved and managed for its wild character. Alternative E would propose as wilderness a single tract of contiguous wilderness in the Beaver Basin (13,180) and Chapel Basin (5,220 acres) comprising 18,400.

1. PEER urges that Alternative E be modified to include 2,094 acres of the Grand Sable Dunes as a second unit of proposed wilderness. Thus, PEER advocates 20,500 acres of Pictured Rocks as wilderness, or 28% of the park.

The NPS prefers Alternative D with 11,739 acres of proposed wilderness. Alternative D fails to protect the wild character of the suitable lands in Pictured Rocks. Alternative D excludes 8,800 suitable acres from a wilderness proposal.

2. **Chapel Basin**  
Alternative D provides no protection to the Chapel Basin's 5,220 acres. The only apparent reason for this failure is that the NPS refuses to close 1.75 miles of old logging road that traverses sections 31 and 32.

The Chapel Basin contains miles of foot trails and some designated campsites, all of which would continue to be open and accessible to public use if the area were designated wilderness. The Upper Peninsula of Michigan contains thousands of miles of old logging roads on both public and private lands that are open to vehicles. But the UP contains

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### PEER—Public Employees for Environmental Responsibility

1. The Grand Sable Dunes, a designated research natural area (RNA), are among the best examples of perched dune systems in the world (Dorr, J.A. and D. F. Eschman, 1972, *Geology of Michigan*. University of Michigan Press.) The Grand Sable Dunes were not determined to be suitable for wilderness due to their proximity to Alger County Road H-58 and the protection already afforded it from the RNA designation. Research natural areas contain prime examples of natural resources and processes, including significant genetic resources that have value for long-term observational studies or as control areas for manipulative research taking place outside the park. Activities in research natural areas are restricted to nonmanipulative research, education, and other activities that will not detract from an area's research values. (NPS *Management Policies* 2001, 4.3.1). Federal land management agencies, including the National Park Service, have established a national network of research natural areas. The RNA designation affords more ecological protection than the wilderness designation. The highly protective pristine management prescription was applied to the Grand Sable Dunes in every alternative.

2. The National Park Service applied the same primitive management prescription to most of the Chapel Basin (except for the casual recreation prescription surrounding the trails to Chapel Lake and Chapel Beach) as it did for the Beaver Basin. It was not included in the wilderness proposal because it receives the most amount of day use hiking in the national lakeshore. Excluding the heavily used portion from wilderness (as was done for the Little Beaver Lake road and campground) would have left a fragmented narrow unit both east and west of the basin. The logging road you referenced in sections 31 and 32 was not a factor in the decision. The road has been closed.

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no national park wilderness. A fair and balanced assessment of public benefits would select wilderness protection for the Chapel Basin rather than 1.75 miles of logging road.

**Beaver Basin**

3. Alternative E fails to protect all of the suitable lands (13,180 acres) in the Beaver Basin. Instead, the NPS proposes to protect only 11,739 acres. At issue may be an old, non-maintained administrative road of 1.75 miles.

In addition the NPS proposes excluding areas from wilderness because wilderness would require the removal of a vault toilet, bulletin board and one mile self guided nature trail near the Little Beaver Lake Campground. However, it is not necessarily the case that the toilet or the physical trail must be removed from a prospective wilderness. The 8-site Beaver Lake campground could be converted to walk in sites. While, wilderness designation would mean that the bulletin board should come down but preserving a bulletin board seems like a flimsy obstacle indeed to wilderness protection.

4. **Grand Sable Dunes**  
The Grand Sable Dunes should also be proposed as wilderness. In April 2002, the NPS found the area unsuitable because of its size and proximity to a dirt county road. Neither basis for disqualification is valid.

**A. Size**

NPS Management Policies unequivocally require that National Park Service lands will be considered suitable for wilderness if they are at least 5000 acres or of sufficient size to make practicable their preservation and use in an unimpaired condition, and if they possess the following characteristics (as identified in the Wilderness Act):

- The earth and its community of life are untrammeled by humans, where humans are visitors and do not remain;
- The area is undeveloped and retains its primeval character and influence, without permanent improvements or human habitation;
- The area generally appears to have been affected primarily by the forces of nature, with the imprint of humans' work substantially unnoticeable;
- The area is protected and managed so as to preserve its natural conditions; and
- The area offers outstanding opportunities for solitude or a primitive and unconfined type of recreation. NPS Management Policies (2001) 6.2.1.1 Primary Suitability Criteria.

Department of the Interior (DOI) regulations at 43 CFR Part 19 assist in determining if areas meet the criteria for wilderness suitability. Most importantly, DOI regulations defines "roadless area" as a reasonably compact area of undeveloped Federal land which possesses the general characteristics of wilderness and within which there is no improved

3. The preferred alternative, which includes proposed wilderness in the Beaver Basin, was developed in response to many public comments. A primary concern of half our public was continued vehicular (and boat trailer) access to the popular small Beaver Lake campground and launch ramp. Drawing the wilderness boundary around the access road, campground, and launch ramp responds to these concerns and still leaves a viable wilderness area in the Beaver Basin.

4. Please see response 1.

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4.

road that is suitable for public travel by means of four-wheeled, motorized vehicles intended primarily for highway use. 43 CFR 19.2.

The Grand Sable Dunes area meets every one of these criteria and the NPS is flatly wrong to assert that because the Dunes are only 2,094 acres in size the area is automatically unsuitable as wilderness.

### ***B. Proximity of Road***

The NPS further disqualified the Grand Sable Dunes because of the proximity of Alger County Road H-58. This decision is improper.

The wilderness suitability assessment is aimed at determining the wilderness character of roadless undeveloped park areas. The term "wilderness character" applies only to the immediate land involved, not to influences upon it from outside areas. Visual, audible or other human influences from outside an undeveloped roadless area do not disqualify that area, or any part of it, from wilderness suitability.

The suitability of each possible acre of roadless area is to be ascertained on the basis of the area itself. Sights and sounds from outside the area do not render an undeveloped roadless area unsuitable for wilderness. If it were otherwise, wilderness boundaries would need to be miles from road corridors and exclude mountaintops from which the lights of a city may be visible. Such a practice would be contrary to everything Congress has said about designating wilderness. Yet the NPS applied such a yardstick to disqualify the Grand Sable Dunes.

### **Summary**

Alternative E, even as modified as we propose, would designate only 28% of the park as wilderness. Motorboats will continue to operate in all of the waters within the park boundary, which constitute 27,000 acres (39%) of the park.

5.

PEER has also learned that, due to political pressure from the Department of the Interior, these waters will also be open to jet-skis, a decision that we would also oppose.

Under Alternative E, only those park areas qualified for wilderness preservation would be wilderness, with little or no disruption to established uses such as hunting, fishing, camping or motorboat use.

All of Beaver Basin, Chapel Basin and the Grand Sable Dunes qualify for a wilderness recommendation to Congress both under the NPS Management Policies (2001) and under the intent of the Wilderness Act. Senator Frank Church made this clear to then Assistant Secretary of the Interior Nathaniel Reed in the wilderness oversight hearings of May 5, 1972. Senator Church stated that

"[I]n the absence of good and substantial reasons to the contrary, (wilderness) areas within national parks should embrace all wild land. There is no lawful basis for massive exclusions (from wilderness recommendations) of qualified lands on

5. Please see response 2 to the Bluewater Network.

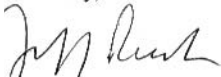
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which no development is planned.” U.S. Senate Hearings, Subcommittee on Public Lands, May 5, 1972, pp. 59-60.

6. The NPS Draft proposes to exclude Chapel Basin and Grand Sable Dunes constitutes a major exclusion in proportion to the whole from a wilderness proposal in the absence of "good and substantial reasons."

Sincerely,

  
 Jeff Ruch  
 Executive Director

cc: Senator Carl Levin  
 Senator Deborah Stabenow

6. Please see responses 1 and 2.